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SSIC NO. 5090.3.A

San Francisco Police Officers' Association  
Local 911 SEIU

August 9, 1996

Richard Powell, Code 1832  
EFA West  
900 Commodore Drive  
San Bruno, CA 94066

Dear Mr. Powell:

The San Francisco Police Officers Association reviewed the Parcel D Remedial Investigation Draft Report, dated June 28, 1996. This letter outlines our concerns about the RI report, in particular the sections that describe conditions at IR-8.

**Sources of contamination at IR-8 are not thoroughly investigated.**

The field investigations described in Section 4.2 do not seem to match the bulleted list of potential contaminant sources listed on page 4-24. Page 4-24 of the draft report bullets six sources of potential contamination at IR-8. A seventh source was identified in the text. As far as we can tell, only two of these sources, related to PCB spillage, were addressed. Why were these five potential sources left out of the investigation?:

- Acidic solutions possibly containing metals, solvents, or other hazardous chemicals discharged into floor drains in former building 503
- Fuel oil possibly leaked or spilled from the former aboveground storage tank near Building 503
- Pesticides discharged into floor drains in former Buildings 503 and 508
- Waste oil from maintenance in the former pump house
- Two oily grease traps located south and west of former Building 503.

Where were the floor drains in former building 503 located? Was this area ever sampled? Where was the former above ground storage tank located? Where was the former pump house located? What evidence is there that

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waste oil from the pump house might have contaminated IR-8? Was the area associated with grease traps for former building 503 ever sampled (located south and west of former building 503)?

Page 4-23 implies that Figure 4.2-1 shows the location of the storm drain line that traverses the PCB spill area. This figure does not, in fact, show the storm drain line. Please add the storm drain line to the figure.

Where was the steam line located near former building 503? Please indicate the location of the former steam line, and the area of the break reported to have occurred in the early 1980s, to figure 4-2-1. Was spillage from this break cleaned up in 1988 as part of the interim remedial action?

Page 4-26: Why was source characterization not conducted at IR-08?

**The 1988 interim remedial action at IR-8 needs to be better described.**

Section 4.2.1 discusses a 1988 interim remedial action at a PCB spill area near former Building 503. This remedial action involved excavating and backfilling part of the PCB spill area. Please indicate on a map, perhaps on figure 4-2-1, the exact location of the excavated and backfilled area. Please a more complete description of this interim remedial action. For example, Where were the 72 soil borings drilled? What did the 157 soil samples reveal? What is meant by the words "spill area?" Does this refer to the area contaminated as a result of the pipe rupture? Where, exactly, were transformers stored? What report gives this information? Please provide the 1986-1987 sampling data in the RI report.

**Contamination plume appears to be poorly defined.**

Why does sampling stop at the edge of Building 606, even though soil samples along the edge of the building show PCB contamination?

It appears that significant PCB contamination exists along the perimeter of and for deeper soils in the IR-8 spill area. This suggests that the interim removal action was not only incomplete, but that the extent of possible PCB contamination is still unknown. How will the Navy approach developing remediation strategy in the feasibility study if the full extent of contamination is not known? What steps will be taken to ensure that the site is fully characterized?

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**Contamination in the parking area on the south side of Building 606.**

It appears that PCB contamination extends into the parking area located on the southern edge of the building. Will this contamination restrict use of this area, now or in the future?

**Dry well may influence migration of PCBs.**

Page 4-49 states that the dry well may have provided a migration pathway for PCBs, yet page 4-52 and 4-53 state that the PCBs are expected to remain in their present locations and not degrade. Please reconcile these statements.

The RI speculates that PCBs and other contaminants may be diffusing through the soil via the dry well associated with the stormwater system. What evidence do you have to support this conclusion? Where is the dry well located with respect to identified contamination? Figure 4.2-1 suggests that the dry well is located upgradient of the soil contamination. If this is the case, it seems likely that water flowing from the dry well will tend to push contamination south/southwest, possibly under building 606.

Some contaminants at IR-8 appear to be present at depths associated with groundwater. How might groundwater influence migration of contaminants? Can they migrate into the storm drain line that traverses the area?

**Past and on-going radiation studies are poorly integrated into the RI report.**

The Phase III Radiation Investigation Field Workplan suggests soil sampling for radiation in the vicinity of former Building 508. Please describe the reasons for this investigation in Section 4.2 of the RI report. How will results of the radiation investigation be integrated into the RI report, and the human health risk assessment? What previous radiation investigations have been conducted in the area?

Why was radiation contamination at building 346 not considered in the human health risk assessment?

**Wind at Hunters Point may influence migration of contaminants, especially during cleanup.**

Please provide a more complete discussion of wind patterns across Parcel D.

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We appreciate the opportunity to comment on the Parcel D Remedial Investigation, and look forward to your response. Please direct any questions about these comments to Mr. Chris Cunnie, Vice-President, San Francisco Police Officers' Association, (415) 861-5060.

Sincerely,

**SAN FRANCISCO POLICE OFFICERS'  
ASSOCIATION, SEIU LOCAL 911**

A handwritten signature in cursive script, appearing to read "Al Trigueiro".

Al Trigueiro  
President

AT/lw

cc: Willie Brown, Mayor  
Fred Lau, Chief of Police  
Chris Cunnie  
Matt Castagnola  
Kyle Ching